

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LIBERTY PATENTS, LLC.,

Plaintiff,

v.

LENOVO GROUP LIMITED, ET AL.,

Defendants.

Case No. 2:20-cv-314-JRG-RSP
(Lead Case)

JURY TRIAL DEMANDED

JOINT MOTION TO DISMISS COMPAL

Plaintiff Liberty Patents LLC (“Liberty Patents”) and Defendants Compal Electronics, Inc. and Compal Information Technology (Kunshan) Co. Ltd. (collectively “Compal”) hereby submit this Joint Motion to Dismiss Compal with Prejudice, and the parties stipulate as follows:

WHEREAS, on September 28, 2020, Liberty Patents filed a lawsuit against, *inter alia*, Compal for infringement of U.S. Patent Nos. 6,535,959, 6,920,573, and 7,493,612 (collectively, “the Patents-in-Suit”);

WHEREAS, on January 5, 2021, Compal filed an Answer raising defenses of, *inter alia*, non-infringement and invalidity;

WHEREAS, Liberty Patents has reached an agreement with a third-party relating to the Patents-in-Suit (i.e., the Liberty/Third Party Agreement);

NOW, THEREFORE, in consideration thereof, Liberty Patents and Compal, through their attorneys of record, request this Court to dismiss with prejudice Liberty Patents’ claims under the Patents-in-Suit and solely with respect to products and services licensed or released under the Liberty/Third Party Agreement, and without prejudice with respect any other claims.

Liberty Patents and Compal further request that each party bear its own costs, attorneys fees, and expenses with respect to those claims.

Dated: July 9, 2021

Respectfully submitted,

/s/ Zachariah S. Harrington

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*Counsel for Defendants Compal Electronics, Inc.
and Compal Information Technology (Kunshan)
Co. Ltd.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on 9th day of July 2021, the above document was filed with the Clerk of Court using CM/ECF which will send notification of such filing to the attorneys of record in this case.

/s/ Zachariah S. Harrington
Zachariah S. Harrington